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Attorneys for Defendant, Imran Husain  
UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

IMRAN HUSAIN,

Defendant.

No. CR 14-149 RS

**DECLARATION OF GEORGE B. NEWHOUSE,  
JR. IN SUPPORT OF DEFENDANTS  
SENTENCING MEMORANDUM;  
SENTENCING LETTERS**

I, George B. Newhouse, Jr., declare as follows:

1. I am counsel for Defendant Imran Husain and am admitted to practice before this Court.

This declaration is filed in order to provide the court with three sentencing letters that Defendant Husain is respectfully filing as part of his Sentencing Memorandum. One of the letters has been partially redacted to conceal identifying personal information such as address or other data that needs to be redacted in a public filing. The original unredacted copy will be brought to Court should the Court or the government wish to inspect them.

2. Exhibit A is a letter from Imran's spouse, Akhee (Grace) Rahman.

3. Exhibit B is a letter from Imran's brother-n-law, Reza Rahman.

4. Exhibit C is a letter from Imran's Uncle, Rubina Hasan.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 1, 2019<sup>4</sup> at Los Angeles, CA.

/s/ George B. Newhouse, Jr.

George B. Newhouse, Jr.

# **EXHIBIT A**

September 27, 2019

Honorable Judge Seaborg  
United States District Court  
450 Golden Gate Avenue  
San Francisco, CA

Dear Judge Seaborg,

My name is Akhee Rahman, and I am Imran Husain's wife. We have been married for 25 years. I would like to tell you a little bit about the Imran I know. He is a kind and loyal friend, a devoted caring father and a loving son.

Imran is a kind, loving, funny, generous person and in 25 years we have had a good relationship thru out these years. He is my best friend. He has been a source of comfort and reassurance and predictability. He is has always been there for me through all my difficult times such as my mothers' illness which I have straggled with recently.

His arrest and subsequent detention at MDC Los Angeles for 3 nights was a traumatizing experience for him and for all of us, especially to his daughter who was 10 years old and was present at the airport the day he was arrested at Los Angeles Airport.

He has changed drastically since that day. Being locked up was hard on him emotionally and physically. He is claustrophobic and he struggled with panic attacks. The incarceration frightened him tremendously and he understood clearly that how far he drifted from what kind of person he wanted to be. As of that moment, he set out to make amends. He talked about how he wanted to make the right decisions. He discussed with me and father what are right steps to take from there on and made the decision quickly to plead guilty and own up to his mistakes.

The last 5 years have been stressful for all of us including our family and have been filled with the uncertainty of not knowing his fate.

Our daughter is the center of our lives, and she has gone through difficult times in the last few years. She started showing signs of anxiety and depression around the time Imran was arrested. Subsequently, she was diagnosed with both anxiety and depression and started on anti depressant medication. Imran was instrumental in getting her the help she needed and to find her the best help he could find in the form of therapists, psychiatrists and treatment centers.

She spent over a year at treatment center for anxiety and depression and Imran's primary focus became helping his daughter through these difficult times.

Imran continues to take care of her on a daily basis including her ongoing treatment and continues to be primary support. Incarceration would have a devastating affect on his daughter and all of us including his ailing mother who was recently diagnosed with early stage of Alzheimer's and my mother who is recovering from a severe stroke and partial paralysis.

Ever since I have known Imran, his relationship with his parents has been extremely close. He calls his mother regularly to check on her. Since travel has been difficult for him with his current restrictions he has not been able to see her as often, but he is hoping to see her as soon as he can.

Imran regrets deeply his crime and not a day goes by that he wishes he had not taken the decisions and actions that he did. Since his arrest he has turned his focus on real estate and his daughter's mental health.

I sincerely hope your honor will consider giving him leniency and allow him to remain free.

Sincerely,

Akhee Rahman



# **EXHIBIT B**

Sep 27, 2019

Hon. Richard Seaborg

United States District Court

450 Golden Gate Avenue

San Francisco, CA

Re: Character Reference for Imran Husain

Dear Judge Seaborg,

I am writing a personal reference for Imran Husain. I have known Imran for about 25 years, of which he has been my brother in-law for the past 20 years. During these years, I have come to know Imran quite well. I found him to be a genuine and caring individual and above all a great father to his daughter. Despite having lost his father recently, Imran has remained true to his core values of caring for his family and working hard.

If you require any additional information, feel free to contact me at [REDACTED] or via my personal email at [REDACTED].

Sincerely,

A handwritten signature in dark ink, appearing to read 'Reza Rahman', with a long horizontal flourish extending to the right.

Reza Rahman

Head of Retail Strategy and Communications

Samsung Electronics America

[REDACTED] Plano, TX 75023

# EXHIBIT C

September 29, 2019

Hon. Richard Seaborg  
United States District Court  
450 Golden Gate Avenue  
San Francisco, CA

Dear Judge Seaborg,

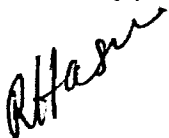
My name is Rubina Hasan and I am writing a character reference for Imran Husain, my nephew, whom I have known since the day he was born. Since a larger part of Imran's childhood was spent in our ancestral home where my family lived also Imran and I are very close and have remained so over the many years. The Imran I know is straightforward, fun loving, generous and kind and ever willing to help any family member in need.

Imran reached out to me last week, asking for a character letter. I was shocked to hear about his circumstance. Personally, I can state with no doubt, that he is one of the most helpful, dependable and sincere person I know. The manner in which Imran was there for his parents and took care of his ailing father and now his mother with dementia is exemplary. Not a day goes by when Imran does not call his mother to find out how she is doing no matter how busy his schedule. I am particularly impressed by Imran's devotion to his daughter and the time and effort he spends in managing her welfare. When my family and I visited Imran in his apartment he gave us his bedroom while he slept on the floor in the family room. He even loaned us his car for the duration of our stay. My husband and children included will not soon forget his hospitality. One of Imran's most noteworthy commitments continues to be the education of numerous family members. It is because of his generosity that many of them have acquired an education and now have proper jobs transforming their lives. Many in India appreciate his compassionate nature and depend on his generosity.

It is my sincere hope that the court takes this letter into consideration, despite the current case, I still believe Imran Husain to be an honorable individual, a valuable member of our community and a good human being at heart.

My entire family love and support Imran, and wish him the best outcome for this case.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'R. Hasan' or 'Rubina Hasan', written in a cursive style.

Rubina Hasan